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May 24, 2019

Regional Freedom of Information Officer
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Re: Freedom of Information Act Request – Portland Harbor Superfund Site

Dear FOIA Administrator:

Pursuant to the Freedom of Information Act, 5 U.S.C. Section 552, I request that all documents relating to the following be provided to me:

1. Any food web or bioaccumulation models developed, evaluated, proposed, considered, approved, adopted, or rejected in connection with the human health risk assessment and ecological risk assessment for the Portland Harbor and all supporting documents thereto, including but not limited to any studies, reports, figures, tables, data, models, or model inputs;
2. The consideration, approval, adoption, or rejection of any food web or bioaccumulation models developed by John Toll;
3. EPA's determination that peer review of John Toll's food web or bioaccumulation models must occur and if it occurred, the results of that peer review;
4. Windward Environmental, LLC. 2013. Portland Harbor RI/FS Final Remedial Investigation Report- Appendix G: Baseline Ecological Risk Assessment (Each Volume) Prepared for The Lower Willamette Group. Portland, OR.
5. Windward Environmental, LLC. 2015. Portland Harbor RI/FS Bioaccumulation Modeling Report. Prepared for The Lower Willamette Group.
6. Windward Environmental LLC. 2004. Portland Harbor RI/FS. Ecological risk assessment: Approach for the preliminary risk evaluation for ecological receptors. Prepared for Lower Willamette Group.

7. Windward Environmental, LLC. 2004 Portland Harbor RI/FS. Technical Memorandum: evaluating steady-state aquatic food web models for the Portland Harbor Superfund site. Prepared for The Lower Willamette Group.
8. Windward Environmental, LLC. 2005. Portland Harbor RI/FS. Ecological Preliminary Risk Evaluation. Prepared for The Lower Willamette Group.
9. Emails dated 1/26/10 and 1/29/10 from John Toll regarding pooling of endpoints for predictive models and all related or responsive correspondence.

As used in this request, the words “any” and “all” mean each and every. The term “relating to” means in whole or in part to discuss, describe, reflect, memorialize, contain, analyze, study, report on, comment on, evidence, constitute, embody, identify, state, consider, recommend, set forth, concern, address, deal with or in any way pertain to.

In addition, the request for models and model inputs shall include: (1) working electronic copy(ies) of the food web model(s), (2) instructions related to running the model(s), (3) uncompiled version(s) of the model(s) (electronic format and paper copy of the model code), (4) identification of any applets that are required to successfully run the model(s), such as VBA code libraries, (5) a complete description the steps required to run the model(s) in sufficient detail to allow another analyst to duplicate the steps and/or modules, in another software program, (6) copies of model validation runs, (7) copies of the of the raw data and description(s) of the interim steps used in the derivation of model inputs, (8) formal model documentation (including detailed User’s Guide, Technical Guidance, peer-reviewed papers, etc.) that describes the initial development and subsequent evolution of the modelling frameworks, and (9) any QA/QC (debugging) assessments performed on the models related to their use in the Portland Harbor.

I have already reviewed the administrative records online for the above-requested reports and was not able to locate the requested reports.

Please provide a copy of the records in their native electronic format on USB or other electronic media. When providing electronic records, please include metadata if reasonably available.

In order to help you to determine my status to assess fees, I am an attorney seeking information for use on behalf of my client’s business. Please supply the requested records without informing me of the cost if the fees do not exceed \$500.00, which I agree to pay as necessary. Otherwise, I ask that you notify me of any search or duplication costs exceeding \$500.00, so that I may decide which records I want copied.

If you are not the appropriate contact for this FOIA request, please let me know so that I may direct this request to the appropriate contact. If you deny any part of this request, please cite

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each specific reason that you believe justifies your refusal to release the information with respect to each document or category of documents refused. Please also notify me of any appeal procedures available under the law.

If you have questions, please contact me at your convenience. Thank you in advance for providing the requested information.

Sincerely,

A handwritten signature in black ink that reads "Lisa DeBord". The signature is written in a cursive, flowing style with a large initial "L" and a long, sweeping underline.

Lisa N. DeBord